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8 *Attorneys for Defendant Fidelity Life*

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7 ESTATE OF JENNIFER LOUISE
8 TASCHEK; MICHAEL HUERTA, a
9 personal representative of JENNIFER
10 LOUISE TASCHEK; and MICHAEL
11 HUERTA, an individual;

12 Plaintiffs,
13 vs.
14 FIDELITY LIFE ASSOCIATION d/b/a
15 FIDELITY LIFE; DOES I-X and ROES I-X,
16 Defendants.

CASE NO.: 2:23-cv-00280-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINES**

(Third Request)

17 IT IS HEREBY STIPULATED by and between Defendant FIDELITY LIFE
18 ASSOCIATION (“Defendant”), by and through its counsel of record, Fabian VanCott and
19 Plaintiff MICHAEL HUERTA (“Plaintiff”), by and through his counsel Mullins and
20 Trenchak, hereby stipulate and agree as follows:
21

- 22 1. On April 18, 2023, the Court entered an Order granting the Stipulated
23 Discovery Plan and Scheduling Order submitted by the parties. ECF No. 13.
- 24 2. The Court entered an Order granting the First Stipulation to extend the
25 discovery and dispositive motion deadlines on July 24, 2023. ECF No. 17.
- 26 3. The Court entered an Order granting the Second Stipulation to extend the
27 discovery and dispositive motion deadlines on December 13, 2023. ECF No. 22.
- 28 4. The parties have continued engage in settlement discussions with the hopes

1 of a global resolution, and thereby stipulate and agree to extend the dispositive motion
2 deadline seven (7) days to allow the parties sufficient time to attempt a global resolution.

3 **DISCOVERY COMPLETED/STATEMENT OF DISCOVERY REMAINING**

4 The parties have completed discovery.

5 **~~PROPOSED SCHEDULE~~**

6 The parties stipulate and agree that:

7 1. **Dispositive Motions:** The parties shall have through and including **January**
8 **16, 2024**, to file dispositive motions, which is more 30 days after the discovery deadline.

9 2. **Pre-Trial Order:** If no dispositive motions are filed, the Joint Pretrial Order
10 shall be filed thirty (30) days after the date set for the filing of dispositive motions. In the
11 event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be
12 suspended until thirty (30) days after decision on the dispositive motions or by further order
13 of the Court.

14 This stipulation and order is sought in good faith and not for the purpose of delay.

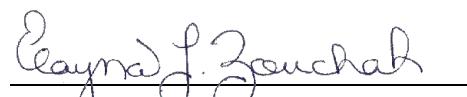
15 DATED this 8th day of January 2024.

16 LAW OFFICE OF
17 MULLINS & TRENCHAK
18 /s/ Philip J. Trenchak, Esq.
19 Philip J. Trenchak, Esq., Bar No. 9924
1614 S. Maryland Parkway
Las Vegas, Nevada 89104
Attorney for Plaintiff

20 FABIAN VANCOTT
/s/ Trevor Waite
Trevor Waite, Esq.
Nevada State Bar No. 13779
FABIAN VANCOTT
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Attorney for Defendant

21 **ORDER**

22 IT IS SO ORDERED January 12, 2024.

23 
United States Magistrate Judge